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August 15, 2022

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

Re: *Equitable Advisors, LLC v. Christopher J. Gordon, et al.*,  
Civil Docket No. 22-cv-04990 (VSB)

Dear Judge Broderick:

This firm represents Defendant Jo Ann Weinstein in her capacity as co-trustee of the Linda M. Kahn 2015 Revocable Trust (the “Defendant Weinstein”) in the above interpleader action (the “Action”). We write pursuant to Your Honor’s Individual Rule 1.G to respectfully request, with the agreement of Plaintiff Equitable Advisors, LLC (“Equitable”), a further extension of the Defendant Weinstein’s time to answer, move, or otherwise respond to Plaintiff’s interpleader complaint dated June 14, 2022 (the “Complaint”), to and including September 19, 2022. Counsel for Equitable and the Defendant Weinstein have executed a stipulation extending the Defendant Weinstein’s time to respond to the Complaint to September 19, 2022 (the “Stipulation”), which the Defendant Weinstein and Equitable respectfully request be So Ordered by the Court, and which is attached to this Letter for Your Honor’s consideration.

Defendant’s Weinstein’s time to respond to the Complaint was initially on or before July 18, 2022. On July 18, 2022, this Court endorsed Defendant Weinstein and Equitable’s joint stipulation to extend Defendant Weinstein’s time to respond to the Complaint to August 17, 2022. *See* Dkt. 14. Last week, on August 9, 2022, five of the six beneficiaries of the Trust for which the Defendant Weinstein is a co-trustee appeared in this Action through counsel, and counsel for these beneficiaries and Equitable agreed by stipulation to extend these beneficiaries’ time to respond to the Complaint to September 19, 2022. *See* Dkt. 19.

As set forth in the Stipulation attached to the present letter, with the majority of the beneficiaries of the Trust recently appearing in this Action through an attorney, the additional extension of time for Defendant Weinstein to respond to the Complaint will permit counsel for the parties the opportunity to discuss this matter and the parties' positions prior to responding to the Complaint, with the goal of achieving the most efficient and cost-effective resolution and administration of the present dispute.

Thank you for your consideration.

Respectfully submitted,

*/s/ Paul Weinstein*

Paul Weinstein

cc: All counsel (by ECF)

# **STIPULATION**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

EQUITABLE ADVISORS, LLC,

Plaintiffs

- against -

CHRISTOPHER J. GORDON, individually and in  
his representative capacity as co-trustee of THE  
LINDA M. KAHN 2015 REVOCABLE TRUST,  
JO ANN WEINSTEIN, in her representative  
capacity as co-trustee of THE LINDA M. KAHN  
2015 REVOCABLE TRUST, JASON REISCH,  
DANIEL REISCH, NAAMA ASHTAMKER,  
ALON MALICHI, and NAOR MALICHI,

Defendants.

Civil Action No. 22 Civ. 04990 (VSB)

**STIPULATION**

**IT IS HERBY STIPULATED AND AGREED** in the above-entitled action, by and between the undersigned counsel for Plaintiff Equitable Advisors, LLC (“Equitable”) and Defendant JO ANN WEINSTEIN, solely in her representative capacity as co-trustee of THE LINDA M. KAHN 2015 REVOCABLE TRUST (“Defendant Weinstein”) as follows:

1. By Stipulation dated July 14, 2022, Equitable and Defendant Weinstein stipulated and agreed that Defendant Weinstein’s time to move, answer or otherwise respond to the Complaint was extended to and including August 17, 2022.

2. Since July 14, 2022, six additional parties appeared in this case. One party, Defendant Christopher J. Gordon (“Gordon”), on July 20, 2022, filed an Answer with Counterclaims as against Equitable. On August 4, 2022, Equitable and Gordon agreed to extend Equitable’s time to respond to the counterclaims of Gordon to September 8, 2022.

3. On August 9, 2022, a Notice of Appearance was filed by attorney Stephen E. Turman, Esq., on behalf of the five additional parties named by Equitable in this Action (in addition to Gordon and Defendant Weinstein), who are beneficiaries to the Linda M. Kahn 2015 Revocable Trust, of which Defendant Weinstein is a Co-Trustee, along with Gordon. By Stipulation filed that same day, Equitable and Mr. Turman agreed to extend these five beneficiaries' time to respond to the Complaint to September 19, 2022.

4. Equitable and Defendant Weinstein have agreed that a further extension of time for Defendant Weinstein to move, answer or otherwise respond to the Complaint to September 19, 2022, would facilitate the efficient and cost-effective administration of this case.

5. Accordingly, it is hereby stipulated and agreed between Equitable and Defendant Weinstein that the time for Defendant Weinstein to move, answer or otherwise respond to the Complaint is hereby extended to and including September 19, 2022.

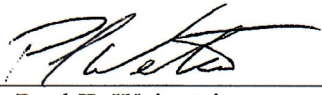
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Dated: New York, New York  
August 15, 2022

D'ARCAMBAL OUSLEY & CUYLER  
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*Attorneys for Plaintiff Equitable Advisors,  
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SO ORDERED:

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U.S.D.J.